## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DEMING ZHOU and	)
THERESA CHANG,	)
	)
Plaintiffs,	)
	) Case No. 07 C 6524
v.	)
	) Judge Hibbler
KAIBLE CORPORATION and	)
KAI JIANG,	) Magistrate Judge Keys
	)
Defendants.	)

## AGREED MOTION TO SUBSTITUTE COUNSEL

Defendants Kaible Corporation ("Kaible") and Kai Jiang ("Kai") respectfully move this Court under Local Rule 83.17 for an order granting leave to David A. Genelly and James E. Judge of Vanasco Genelly & Miller to file substitute appearances as counsel for Defendants, and for Stephen C. Voris and Kimberly A. Cloud of Burke, Warren, MacKay & Serritella P.C. to withdraw their appearances. Counsel for Plaintiffs has agreed to the substitution.

The Court has granted one agreed extension of time for Defendants to file responsive pleadings, but has made no substantive rulings in this matter. Defendants do not expect the substitute appearances to cause any delays to the schedule in this matter.

WHEREFORE, Defendants Kaible Corporation and Kai Jiang respectfully request an order granting David Genelly and James Judge leave to file their substitute appearances in this action.

Respectfully submitted,

KAIBLE CORPORATION and KAI JIANG

By: s/ David A. Genelly

David A. Genelly (00932663) James E. Judge (6243206) VANASCO GENELLY & MILLER 33 North LaSalle Street, Suite 2200 Chicago, IL 60602 (312) 786-5100

## **CERTIFICATE OF SERVICE**

The undersigned, an attorney, states that he served a copy of the foregoing Notice of Motion and to present the Motion to Substitute Counsel, upon:

Lynn A. Ellengberger Anthony R. Licata Jessica Anne Edgerton Schefsky & Froelich, Ltd. 111 E. Wacker Drive, Suite 2800 Chicago IL 60601

Stephen C. Voris Kimberly A. Cloud Burke, Warren, MacKay & Serritella, P.C. 330 North Wabash Avenue, 22nd Floor Chicago, Illinois 60611-3607

via e-mail through the electronic filing system for the United States District Court for the Northern District of Illinois, Eastern Division and by United States Mail, postage prepaid, at 33 North LaSalle Street, Chicago IL 60602, before 5:00 P.M. on January 28, 2008.

s/ David A. Genelly